

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

KELLI DAVIS, ON BEHALF OF  
HERSELF AND ALL OTHERS  
SIMILARLY SITUATED,

*Plaintiff,*

V.

CAPSTONE CYPRESS OPCO, LLC  
D/B/A CYPRESS PLACE ASSISTED  
LIVING, MME CAPITAL HOLDINGS,  
LLC AND BEJE FOSTER,  
INDIVIDUALLY,

*Defendants.*

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No. 2:25-CV-235

**DEFENDANTS' CORPORATE DISCLOSURE STATEMENT  
AND CERTIFICATE OF INTERESTED PARTIES**

Defendants Capstone-Cypress OPCO, LLC d/b/a Cypress Place (incorrectly named as Capstone-Cypress OPCO, LLC d/b/a Cypress Place Assisted Living), MME Capital Holdings, LLC and Beje Foster, Individually (“Defendants”) hereby file their Corporate Disclosure Statement and Certificate of Interested Parties pursuant to Federal Rule of Civil Procedure 7.1, and shows as follows:

1. Pursuant to Rule 7.1(a), Defendants Capstone-Cypress OPCO, LLC and MME Capital Holdings, LLC certify that they have no parent corporation(s) and no publicly held corporation owns 10% or more of their stock.
2. The parties financially interested in the outcome of this litigation are:
  - a. Kelli Davis is a citizen of Texas, and the Plaintiff, and has a financial interest in the outcome of this litigation.

- b. Capstone-Cypress OPCO, LLC is a Texas limited liability company, is a Defendant, and has a financial interest in the outcome of this litigation.
- c. MME Capital Holdings, LLC is a Texas limited liability company, is a Defendant, and has a financial interest in the outcome of this litigation.
- d. Douglas Welmaker of Welmaker Law, PLLC is the attorney for Plaintiff and has a financial interest in the outcome of this litigation.

Dated: March 27, 2025.

Respectfully submitted,

**HALLETT & PERRIN, P.C.**

/s/ Barrett C. Leshner

Barrett C. Leshner

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I certify that on the 27<sup>th</sup> day of March, 2025, I submitted the foregoing document to the Clerk of Court for the U.S. District Court, Eastern District of Texas, using the electronic case filing system of the Court. I hereby certify that I have served all counsel of record in the manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Barrett C. Leshner

Barrett C. Leshner